



March 17, 2017

Subject: EU Hazardous Materials Directives 2002/95/EC and 2011/65/EU – Restriction of Hazardous Substances (RoHS)

Uncoated stainless steel, titanium, zirconium and niobium from Ulbrich Steel complies with Directives 2002/95/EC, 2011/65/EU and the January 2017 scope change (RoHS III). We certify that the following listed substances are not present in quantities exceeding the stated maximum concentration levels. The content of RoHS hazardous substances (see list below) is at or near zero. The chromium in our stainless steel is metallic which is zero-valent.

**RoHS Hazardous Substance List:**

<b>Compliance Definition: RoHS Restricted Substances in Parts and Materials</b>	
<b>Substance Category</b>	<b>Threshold Level</b>
Cadmium/Cadmium Compounds	100 ppm per homogeneous materials
Mercury /Mercury Compounds	100 ppm per homogeneous materials
Hexavalent Chromium	1000 ppm per homogeneous materials
Lead/Lead Compounds	1000 ppm per homogeneous materials
Polybrominated Biphenyls (PBB)	1000 ppm per homogeneous materials
Polybrominated Diphenyl Ethers (PBDE)	1000 ppm per homogeneous materials
Bis(2-Ethylhexyl) phthalate (DEHP)	1000 ppm per homogeneous materials
Benzyl butyl phthalate (BBP)	1000 ppm per homogeneous materials
Dibutyl phthalate (DBP)	1000 ppm per homogeneous materials
Diisobutyl phthalate (DIBP)	1000 ppm per homogeneous materials

In addition, Ulbrich makes no intentional additions of Mercury, Radium, Alpha source or low melting point elements during processing of uncoated steel. Toxic elements such as Lead, Arsenic, and Antimony can be impurities in steel and may be considered alloyed with the metal so as to be rendered inert.

Sincerely,

*Debra DeFelice*

Debra DeFelice  
Environmental, Health and Safety Manager  
Ulbrich Stainless Steels and Special Metals, Inc.